

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Cr. No. 15-10338-FDS
	)	
6. HERZZON SANDOVAL,	)	
a/k/a "Casper,"	)	
7. EDWIN GUZMAN,	)	
a/k/a "Playa,"	)	
11. CESAR MARTINEZ,	)	
a/k/a "Cheche,"	)	
14. ERICK ARGUETA LARIOS,	)	
a/k/a "Lobo,"	)	
Defendants	)	

EXHIBIT LIST OF THE UNITED STATES

Pursuant to the Court's pre-trial order, the United States files this list of exhibits that may be introduced in its case-in-chief. The government reserves the right to modify this list with reasonable notice to the defendants:

<u>Exhibit Number</u>	<u>Exhibit</u>
A.	Disc containing recording of ESLS clique meeting, January 25, 2014
B.	Disc containing consensually recorded conversation between CW-1 and Cesar Martinez, a/k/a "Cheche," February 14, 2014
C.	Disc containing recording of ESLS clique meeting, February 16, 2014
D.	Disc containing consensually recorded conversation between CW-1 and Erick Argueta Larios, a/k/a "Lobo," December 8, 2014
E.	Disc containing consensually recorded conversation between CW-1 and Noe Perez Vasquez, a/k/a "Crazy," December 16, 2014

- F. Disc containing consensually recorded conversation between CW-1, Noe Perez Vasquez, a/k/a "Crazy," and Jose Miguel Hernandez, a/k/a "Smiley," a/k/a "Danger," December 14, 2014
- G. Disc containing recording of Eastside Loco Salvatrucha (ESLS) clique meeting, February 8, 2015
- H. Disc containing consensually recorded conversation between CW-1, Jose Hernandez Miguel, a/k/a "Muerto," and Noe Perez Vazquez, a/k/a "Crazy," June 4, 2015
- I. Disc containing recording of ESLS clique meeting, June 14, 2014
- J. Disc containing recording of ESLS clique meeting, July 29, 2015
- K. Disc containing consensually recorded conversation between CW-1, Joel Martinez, a/k/a "Animal," David Morataya, and Luis Cruz-Reyes, October 2, 2015
- L. Disc containing recording of ESLS clique meeting, October 24, 2015
- M. Disc containing consensually recorded conversation between CW-1 and Herzzon Sandoval, a/k/a "Casper," and between CW-1, Sandoval, and Joel Martinez, a/k/a "Animal," December 6, 2015
- N. Disc containing consensually recorded conversation between CW-1, Jose Adan Martinez Castro, a/k/a "Chucky," Edwin Mancia Flores, a/k/a "Chugar," and other MS-13 members, December 13, 2015
- O. Disc containing consensually recorded conversation between CW-1 and Joel Martinez, a/k/a "Animal," January 1, 2016
- P. Disc containing consensually recorded conversation between CW-1, Jose Hernandez-Miguel, a/k/a "Muerto," Mauricio Sanchez, a/k/a "Tigre," Joel Martinez, a/k/a "Animal," and others, January 2, 2016
- Q. Disc containing recording of ESLS clique meeting, January 8, 2016

R. Summary chart of cocaine “protection details” on February 14, 2014, October 17, 2014, and December 8, 2014

1(a)-(u). Photographs of 60 Chester Avenue, Chelsea, Massachusetts, December 14, 2014

2(a)-(b). Autopsy photographs of Javier Ortiz

3. Death certificate, Javier Ortiz

4. Medical records for Victim No. 25

5(a)-(d). Spent projectile and discharged cartridge casings for “Win 380 Auto” .380 caliber bullets recovered from 60 Chester Avenue, Chelsea, Massachusetts, December 14, 2014

6. Photograph of Hector Enamorado, a/k/a “Vida Loca” from Massachusetts State Police photographic array

7. Wanted poster for Hector Enamorado, a/k/a “Vida Loca”

8. Booking photograph of Hector Enamorado, a/k/a “Vida Loca”

9. Transcript of consensually recorded conversation between CW-1, Noe Perez Vasquez, a/k/a “Crazy,” and Jose Miguel Hernandez, a/k/a “Smiley,” a/k/a “Danger,” dated December 14, 2014

10. Transcript of consensually recorded conversation between CW-1 and Noe Perez Vasquez, a/k/a “Crazy,” December 16, 2014

11. Photograph of Gonzalez Auto Repair, 69 Norman Avenue, Everett, Massachusetts

12. Photograph of Luis Solis Vasquez, a/k/a “Brujo”

13. Photograph of Herzzon Sandoval, a/k/a “Casper”

14. Photograph of Edwin Guzman, a/k/a “Playa”

15. Photograph of Cesar Martinez, a/k/a “Cheche”

16. Photograph of Erick Argueta Larios, a/k/a “Lobo”

17. Photograph of Jose Hernandez Miguel, a/k/a "Muerto"
18. Photograph of Mauricio Sanchez, a/k/a "Tigre"
19. Photograph of Victor Manuel-Ruiz, a/k/a "Matador," a/k/a "Vincentino"
20. Photograph of Efrain Yanes Vasquez, a/k/a "Caballo"
21. Photograph of Jose Miguel Hernandez, a/k/a "Smiley," a/k/a "Danger"
22. Photograph of Noe Perez-Vasquez, a/k/a "Crazy"
23. Photograph of Jose Rene Andrade, a/k/a "Inocente"
24. Photograph of silver Cobra model .380 caliber semi-automatic pistol on a pile of leaves outside 7 Cross Street, Somerville, Massachusetts, January 1, 2015
- 25(a)-(b). Silver Cobra model .380 caliber semi-automatic pistol, bearing serial number CP033661, containing five "Win 380 Auto" .380 caliber bullets
26. Proffer letter for CW-11
27. Plea agreement for CW-11
28. Photographs of MS-13 tattoos for CW-11
29. Machete seized from CW-11's address, January 29, 2016
- 30(a)-(b). Black Heckler and Koch P30 semi-automatic pistol containing ten rounds of ammunition, seized from CW-11's address, May 20, 2016
31. One ammunition box containing fifty rounds of 9 millimeter ammunition seized from CW-11's address, May 20, 2016
32. One ammunition box containing nine rounds of 9 millimeter ammunition seized from CW-11's address, May 20, 2016

33. One clear plastic bag containing eighteen rounds of .45 caliber ammunition seized from CW-11's address, May 20, 2016
34. Transcript of consensually recorded conversation between CW-1 and Cesar Martinez, a/k/a "Cheche," February 14, 2014
35. Still photograph of Jose Hernandez Miguel, a/k/a "Muerto," holding one kilogram of cocaine, February 14, 2014
36. Still photograph of Jose Hernandez Miguel, a/k/a "Muerto," holding U.S. currency, February 14, 2014
37. One kilogram of cocaine used in protection detail on February 14, 2014
38. United States Probation pre-trial report listing telephone number for Cesar Martinez, a/k/a "Cheche"
39. Still photograph of Jose Hernandez Miguel, a/k/a "Muerto," October 17, 2014
40. Still photograph of Efrain Yanes Vazquez, a/k/a "Caballo," October 17, 2014
41. Still photograph of one kilogram of cocaine, October 17, 2014
42. Still photograph of U.S. currency, October 17, 2014
43. One kilogram of cocaine used in protection detail on October 17, 2014
44. Transcript of consensually recorded conversation between CW-1 and Erick Argueta Larios, a/k/a "Lobo," December 8, 2014
45. Still photograph of Jose Hernandez Miguel, a/k/a Muerto, December 8, 2014
46. Still photograph of Jose Miguel Hernandez, a/k/a "Smiley," a/k/a "Danger," December 8, 2014

47. Still photograph of multiple kilograms of cocaine, December 8, 2014
48. Still photograph of U.S. currency, December 8, 2014
- 49(a)-(b). Still photographs of Noe Perez-Vasquez, a/k/a "Crazy," with butt of firearm, December 8, 2014
50. Five kilograms of cocaine used in protection detail on December 8, 2014
51. Drug Enforcement Administration certificates of analysis for kilograms of cocaine used in protection details
52. Photograph of Casa Mariachi, 49 Everett Avenue, Chelsea, Massachusetts
53. Silver Ruger 9 millimeter semi-automatic pistol with obliterated serial number seized from Erick Argueta Larios, a/k/a "Lobo," January 28, 2015
54. Transcript of ESLS clique meeting, February 8, 2015
55. Transcript of ESLS clique meeting, July 29, 2015
56. Photograph of Highland Park, Chelsea, Massachusetts
57. Excerpt of 911 call to Chelsea Police Department concerning stabbing of Victim No. 17, Highland Park, Chelsea, Massachusetts, May 12, 2015
58. Medical records for Victim No. 17
59. Still photograph of Jose Hernandez Miguel, a/k/a "Muerto," and Noe Perez Vazquez, a/k/a "Crazy," on June 4, 2015
60. Transcript of consensually recorded conversation between CW-1, Jose Hernandez Miguel, a/k/a "Muerto," and Noe Perez Vazquez, a/k/a "Crazy," on June 4, 2015
61. Transcript of ESLS clique meeting, January 25, 2014
62. Transcript of ESLS clique meeting, February 16, 2014
63. Transcript of ESLS clique meeting, June 14, 2014

64. Transcript of ESLS clique meeting, October 24, 2015

65. Machete and sheathe seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

66. Large knives seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

67. Blue and white rosary beads seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

68. Blue baseball cap with Chicago Bulls logo seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

69. Blue baseball cap bearing "503" seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

70(a)-(b). Sterling .22 caliber semi-automatic pistol and magazine containing six rounds of ammunition seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

71. Two blue bandanas seized from 142 Broadway, Somerville, Massachusetts, July 8, 2015

72. MS-13 tattoo of Edwin Guzman, a/k/a "Playa"

73. MS-13 tattoo of Luis Solis-Vasquez, a/k/a "Brujo"

74(a)-(b). Black Hi-Point .45 caliber semi-automatic pistol containing eight rounds of ammunition seized from Efrain Yanes Vasquez, a/k/a "Caballo," 226 Bradford Street, Pittsfield, Massachusetts, September 15, 2016

75. One magazine containing nine rounds of .45 caliber ammunition seized from Efrain Yanes Vasquez, a/k/a "Caballo," 226 Bradford Street, Pittsfield, Massachusetts, September 15, 2016

76. One box containing fifty packaged rounds of .45 caliber ammunition seized from Efrain Yanes Vasquez, a/k/a "Caballo," 226 Bradford Street, Pittsfield, Massachusetts, September 15, 2016

77. Machete seized from Efrain Yanes Vasquez, a/k/a “Caballo,” 226 Bradford Street, Pittsfield, Massachusetts, September 15, 2016

78. Bag containing twenty-eight rounds of .45 caliber ammunition seized from Efrain Yanes Vasquez, a/k/a “Caballo,” 226 Bradford Street, Pittsfield, Massachusetts, September 15, 2016

79. Black butterfly knife seized from Efrain Yanes Vasquez, a/k/a “Caballo,” 226 Bradford Street, Pittsfield, Massachusetts, September 15, 2016

80. Proffer letter for CW-2

81. Excerpt of consensually recorded meeting between CW-1, Bryan Galicia-Barillas, a/k/a “Chuchy,” and David Lopez, a/k/a “Cylindro,” a/k/a “Villano, April 27, 2015

82. Transcript of consensually recorded meeting between CW-1, Bryan Galicia-Barillas, a/k/a “Chuchy,” and David Lopez, a/k/a “Cylindro,” a/k/a “Villano, April 27, 2015

83. Excerpt of 911 call for murder of Irvin DePaz, Trenton Street, East Boston, Massachusetts, September 20, 2015

84(a)-(h). Photographs of Nissan Pathfinder with blood, red shirt, and red Chicago Bulls baseball cap, Trenton Street, East Boston, Massachusetts, September 20, 2015

85. Red shirt seized from Trenton Street, East Boston, Massachusetts, September 20, 2015

86. Red Chicago Bulls baseball cap seized from Trenton Street, East Boston, Massachusetts, September 20, 2015

87. Still photograph from surveillance video, 90 Trenton Street, East Boston, Massachusetts, September 20, 2015

88. Autopsy photographs of Irvin DePaz

89. Death certificate, Irvin DePaz

90. Transcript of consensually recorded meeting between CW-1, Joel Martinez, a/k/a "Animal," David Morataya, and Luis Cruz-Reyes, October 2, 2015
91. Transcript of consensually recorded conversation between CW-1 and Herzzon Sandoval, a/k/a "Casper," and between CW-1, Sandoval, and Joel Martinez, a/k/a "Animal," December 6, 2015
92. Still photograph of Herzzon Sandoval, a/k/a "Casper," December 6, 2015
93. Proffer letter for CW-7
94. Plea agreement for CW-7
95. Google Earth image of area of Pearl Street, Chelsea, Massachusetts
96. Shirts, jackets, hat, and jeans recovered from basement of 141 Hawthorne Street, Chelsea, Massachusetts, December 27, 2015
97. Transcript of consensually recorded conversation between CW-1 and Joel Martinez, a/k/a "Animal," January 1, 2016
98. Transcript of consensually recorded conversation between CW-1, Jose Hernandez-Miguel, a/k/a "Muerto," Mauricio Sanchez, a/k/a "Tigre," Joel Martinez, a/k/a "Animal," and others, January 2, 2016
99. Excerpt of audio-videotaped ESLS clique meeting where Joel Martinez, a/k/a "Animal," is beaten into MS-13, January 8, 2016
100. Transcript of ESLS clique meeting, January 8, 2016

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Christopher Pohl  
Christopher Pohl  
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 8, 2018.

/s/ Christopher Pohl  
Christopher Pohl  
Assistant U.S. Attorney